

BY ECF

December 11, 2017

**Honorable Leonard D. Wexler, U.S.D.J.
United States District Court for the Eastern District of New York
United States Courthouse
944 Federal Plaza
Central Islip, New York 11722**

**Re: *Renna v. Queens Ledger/Greenpoint Star Inc.,*
Docket No. 2:17-cv-3378 (LDW)(SIL)**

Dear Judge Wexler,

Pursuant to Your Honor's Individual Motion Practice and Rules, 2. B., Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2(b), Plaintiff Roy Renna requests a pre-motion conference in anticipation of filing a motion for default judgment in the above-referenced matter.

Plaintiff filed the Complaint in this action on June 6, 2017. On June 22, 2017, the Defendant was served a Summons, Civil Cover Sheet and Complaint through the New York Secretary of State. Pursuant to Fed. R. Civ. P. 12 an answer or a response was due on July 13, 2017. To this date, Defendant has failed to appear or otherwise defend itself against the allegations contained in the Complaint. On September 6, 2017 the Plaintiff's request for a Certificate of Default from the Court Clerk was granted.

In its default motion, Plaintiff will seek a finding of liability for copyright infringement pursuant to Section 501 et al. of the Copyright Act. Plaintiff will also seek actual damages in the amount to be determined by the Court upon further submissions.

We thank the Court for its consideration of this request for a pre-motion conference.

Respectfully Submitted,

/s/Richard P. Liebowitz
Richard P. Liebowitz
Yekaterina Tsvykin
Liebowitz Law Firm, PLLC
11 Sunrise Plaza, Suite 305
Valley Stream, NY 11580
(516) 233-1660
RL@LiebowitzLawFirm.com
kt@liebowitzlawfirm.com
Attorneys for Plaintiff Roy Renna